

May 19, 2022

**BY ECF AND EMAIL**

Hon. Nicholas G. Garaufis  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Jacob Daskal*, 21 Cr. 110 (NGG)**

Dear Judge Garaufis:

I write on behalf of our client, Jacob Daskal, to respectfully request that the Court temporarily modify the conditions of release imposed in this case to allow Mr. Daskal to attend a religious ceremony for his great grandson on May 19, 2022, at 7:00 p.m., at Schicks Manor at 4901 12<sup>th</sup> Avenue in Brooklyn. On March 4, 2021, Magistrate Judge Kuo ordered Mr. Daskal's release on a \$4,500,000 secured appearance bond. The court imposed conditions of pretrial supervision, which included home detention. The court included as exceptions to the home confinement condition Mr. Daskal's attending religious services or other activities approved by Pretrial Services.

The religious ceremony Mr. Daskal seeks approval to attend is called a Pidyon Ha'Ben. A letter is attached from Rabbi Yechiel Kaufman of the First Congregation Anshe Sfard of Borough Park. That letter explains the nature of the Pidyon Ha'Ben ceremony and its significance to Mr. Daskal. In the past, Mr. Daskal has been permitted to attend religious events related to his great grandson when the event occurred at a synagogue. While this event is not at a synagogue, the ceremony is no less important to Mr. Daskal or his Jewish community. Notably, Rabbi Kaufman's letter indicates that "[t]his special ceremony will be for Baby and Adults." The absence of children alleviates concerns about contact or association with individuals under the age of 18.

I contacted Pretrial Services Officer Amanda Carlson about the instant modification request. Though Pretrial Services acknowledges that the Pidyon Ha'ben is a religious ceremony, Pretrial Services will not consent to Mr. Daskal attending because it is not being held in the synagogue but rather at a catering hall late in the evening. I also corresponded with Assistant United States Attorney Erin Reid about the instant modification request. Ms. Reid informed me that the government objects to the request in light of Pretrial's objection.

Thank you for your consideration of this matter.

Respectfully submitted,

/S/JIS

Jason I. Ser

Henry E. Mazurek

Ilana Haramati

Meister Seelig & Fein LLP

125 Park Avenue, Suite 700

New York, New York 10017

*Counsel for Defendant Jacob Daskal*

cc: Counsel of record (via ECF)  
United States Pretrial Services (via Email)